



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CITY OF PONTIAC GENERAL EMPLOYEES'
RETIREMENT SYSTEM, Individually and on Behalf of
All Others Similarly Situated,

No. 11 Civ. 5026 (JSR)(RLE)

ECF CASE

Plaintiff,

AFFIDAVIT OF
VICTOR MORRISON

- v -

LOCKHEED MARTIN CORPORATION, et al.,

Defendants.

Victor Morrison, being duly sworn, says:

1. My name is Victor Morrison.
2. I was an employee at Lockheed Martin from March 2004 until August 2010.

3. Between 2007 and 2009, I primarily worked in IS&GS as Senior Project Manager on the Federal Trade Commission's "Do Not Call" program.

4. I am a Lean/Six Sigma Black Belt and an ISO 20000 auditor. Using these skills, during my tenure at Lockheed Martin I also worked "part-time" reviewing the performance of various programs.

5. On either May 5 or 6, 2011, I was contacted by a male caller. I do not recall his name and I do not know the name of his employer. The caller told me he is a private investigator hired by a law firm representing "Lockheed and Lockheed's shareholders" and that he was conducting a preliminary investigation into Lockheed Martin. The caller told me the information I provided would be treated as confidential.

6. The caller asked me about several Lockheed Martin programs within IS&GS but I informed the caller that I could not comment on those programs because during my tenure at Lockheed Martin, and specifically between 2008 and 2009, I did not work on the programs he identified.

7. I told the caller that the information he requested was confidential Lockheed Martin information that I would not be allowed to share even if I knew the requested information, which I did not.

8. During the May 2011 call, and in response to the investigator's questions regarding IS&GS programs, I did provide the caller the names of the project managers responsible for several Information Systems and Global Solutions (IS&GS) programs. I suggested that the caller reach out to those individuals for information.

9. I also specifically recall that the caller asked me about the Sentinel program. I told the investigator that I had no experience of any kind with Sentinel and I suggested that the investigator contact Tim Salerno.

10. During the May 2011 call, I provided no substantive information regarding the IS&GS programs mentioned by the caller. None.

11. During the May 2011 call, the caller asked me about Linda Gooden, Chris Kubasik, and Bob Stevens. I told the investigator that these individuals were not the correct individuals to be concerned with if the issue he was investigating involved the performance of the IS&GS programs mentioned during the call.

12. Since the May 2011 call, the caller has contacted me two additional times. The second call lasted less than five minutes. The caller said he called to inform me that the case against Lockheed Martin was moving to the next phase. The third call also lasted only a couple of minutes because I hung up on the caller when he told me that my name was going to be released to Lockheed Martin in connection with a complaint that had been filed against Lockheed Martin. Before I hung up on the caller, he offered to arrange to have a lawyer provided to me at no cost to myself. I flatly rejected that suggestion.

13. At no time during the May 2011 call or in the two subsequent calls did I ever provide the caller with any substantive information regarding Lockheed Martin, IS&GS, specific IS&GS programs, or individuals. Nor, have I authorized the investigator to use my "confidential" information.

14. At no time during the May 2011 call or in the two subsequent calls did I ever provide the caller with my responsibilities in connection with the positions I held during my tenure at Lockheed Martin. I did not even provide the caller with a general description of the positions I held during my tenure at Lockheed Martin

15. At no time during the May 2011 call or in the two subsequent calls did I ever tell the caller that IS&GS often fired employees in order to reduce labor costs. Nor did I tell the caller that inexperienced workers were being assigned to projects, which caused execution problems.

16. At no time during the May 2011 call or in the two subsequent calls did I ever tell the caller that Linda Gooden and Tom Oles were directly responsible for a strategy of underbidding on programs.

17. At no time during the May 2011 call or in the two subsequent calls did I tell the caller that IS&GS focused on cash flow instead of profitability or that IS&GS deliberately understated the cost of labor required for programs. At that time, I would not have believed those statements to be true and I still do not believe those statements to be true.

18. During my tenure at Lockheed and still today, I do not believe that IS&GS was focused on cash flow instead of profitability. I never told the caller who first contacted me in May of 2011 or anyone else that I held that view.

19. At no time during my tenure at Lockheed Martin, and specifically from 2008 to 2009, did I ever, as both a Project Manager and a Performance Reviewer, work on the following projects: a contract with the Veterans Affairs and Federal Reserve in Cleveland, Ohio;

the Sentinel Program, HR Access for the Transportation Security Administration (TSA), or, a help desk program for the National Aeronautics and Space Administration (NASA).

20. At no time during my tenure at Lockheed Martin, did I hear anything other than passing references to the Sentinel program. I have never worked on this project, not even as a Black Belt leader. I do not have FBI clearance. I am aware that Sentinel was at some point identified as a "Red" program, but this was through general conversation, not through specific documents or information received through my position at Lockheed Martin.

21. During my tenure at Lockheed Martin, and specifically between 2008 and 2009, I never worked on HR Access. I know of its existence only because some of my employees on the "Do Not Call" project were shifted to the HR Access project. Between 2008 and 2009, I did not know, and still do not know, when this program was designated "Red," "Yellow," or "Green."

22. During my tenure at Lockheed Martin, and specifically between 2008 and 2009, I did not work on or know information regarding the help desk project for NASA. Between 2008 and 2009, I also did not have any reason to understand when this project was "Red," "Yellow," or "Green."

23. Other than during a single telephone call in 2004, when I participated in a program review, I have never been on weekly or monthly calls with Linda Gooden. Specifically in 2008 and 2009, I did not participate in weekly or monthly calls with Ms. Gooden. In fact, at no time in 2008 or 2009 did I have any contact whatsoever with Ms. Gooden.

24. I discussed the information I swear to in this affidavit with lawyers from DLA Piper. They asked that I provide this affidavit, which I willingly agreed to do. Other than the caller who contacted me in May of 2011, I have not discussed the Pontiac case against Lockheed Martin with anyone.

Dated: May 15, 2012

Victor Morrison

Victor Morrison

Sworn to before me this 15

Day of May, 2012.

Alden Brewster Thomas

Notary Public

